

PURPOSE

The purpose is to establish the policy and procedure for the Michigan Department of Health and Human Services (MDHHS) to ensure that the access of workforce members to sensitive information, including Electronic Protected Health Information (ePHI), contained in MDHHS information systems is appropriate in order to maintain the availability and integrity of sensitive information.

DEFINITIONS

Availability means the property that data or information is accessible and useable upon demand by an authorized person.

Confidentiality means the property that data or information is not made available or disclosed to unauthorized persons or processes.

ePHI is the acronym for Electronic Protected Health Information. It is Protected Health Information that is transmitted or maintained in electronic form.

Information system means an interconnected set of information resources under the same direct management control that shares common functionality. A system normally includes hardware, software, information, data, applications, communications and people.

Integrity means that confidential information has not been altered or destroyed in an unauthorized manner.

PHI is the acronym for Protected Health Information. It is information that can identify a person and contains health related data pertaining to that person.

Workforce member means employees, volunteers and other persons whose conduct, in the performance of work for a covered entity, is under the direct control of such entity, whether or not they are paid by the covered entity. This includes full and part time employees, affiliates, associates, students, volunteers and staff from third party entities who provide service to the covered entity.

POLICY

It is the policy of MDHHS to implement procedures to ensure that all members of its workforce have appropriate access to ePHI and

prevent those workforce members who do not have access from obtaining access to sensitive information, including ePHI.

MDHHS shall implement procedures to determine that the access of a workforce member to ePHI is appropriate.

Access to MDHHS's computing network, applications, data and workstations will be based on the following criteria:

- User-based access that determines user access based on a workforce member's normal work duties, which would allow the individual to see a certain set of information
- Role-based access that determines user access to information based on a workforce member's position
- Context based access that grants access based on the user or role, but filters access based on a particular transaction or context of that workforce member's role

PROCEDURE

Human Resources Responsibility

The background of all MDHHS workforce members shall be adequately reviewed during the hiring process.

Verification checks must be made as appropriate. Verification checks include, but are not limited to:

- Character references.
- Confirmation of claimed academic and professional qualifications.
- Professional license validation.
- Criminal background check.
- Office of the Inspector General database check.

Supervisor/Security Officer

The extent and type of screening shall be based on MDHHS's risk analysis process.

When defining a position, the security responsibilities and supervision required for the position shall be defined based on the program(s) that the workforce member will be working with.

Security responsibilities include general responsibilities for implementing or maintaining security, as well as any specific responsibilities for the protection of the confidentiality, integrity or availability of MDHHS information systems or processes.

REFERENCES

[45 CFR 164.308\(a\)\(3\)](#)

CONTACT

For additional information concerning this policy and procedure, contact the MDHHS security officer at MDHHSPrivacySecurity@michigan.gov.